UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

SEP 10 2012

Mr. Timothy M. Buskirk, District Ranger
Bessey Ranger District, U.S Forest Service
40637 River Loop, P.O. Box 39
Halsey, NE 69142

Dear Mr. Buskirk:

RE: Final Environmental Impact Statement Allotment Management Planning in the McKelvie Geographic Area Project, Managing Livestock Grazing, Bessey Ranger District, Samuel R. McKelvie National Forest, Cherry County, NE

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Clarke County Water Supply proposal. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The FEIS was assigned the CEQ number 20120260.

EPA's review of the Draft EIS resulted in a rating of "Lack of Objections" on April 26, 2010. Since the time of that rating, the project area has experienced severe drought conditions which changed the structural conditions upon which the Allotment Management Plan was based. In recognition of this significant climatic event, EPA recommends that:

1. Prior to implementing the Plan, all of the individual allotments receive a resource condition inventory (pages 2-1 through 2-6 of the FEIS indicate that 9 allotments had not received recent monitoring for vegetation composition or structure).

2. The **assumptions** outlined in *Drought Management on Range and Pastureland, A Handbook for Nebraska and South Dakota* (Reece et al. 1991) are reviewed prior to calculating stocking rates. One such assumption is located within the "Drought Management Gudelines" section of that reference, and states:

   *"Drought management guidelines will be implemented according to recommendations found in Precipitation from the preceding two years, October through September, has a direct influence on forage production and range recovery in the upcoming year. The greatest emphasis is placed on precipitation in the immediate prior year because it has the greatest influence on vegetation in the upcoming year. Precipitation in the immediate prior year is weighted at 75 percent, while precipitation from two years prior is weighted at 25 percent. This method provides for range recovery, and if needed, an opportunity to reduce livestock numbers before winter costs are incurred. This prediction **assumes** that precipitation in the upcoming winter and spring will be near average. If precipitation levels differ dramatically*

from average, stocking levels will need to be adjusted further prior and during the current grazing season."

3. Drought forecasts prepared by the National Oceanic and Atmospheric Administration (NOAA) be factored into the "adaptive management plan." These forecasts can be found at the following website: http://www.cpc.ncep.noaa.gov/products/expert_assessment/seasonal_drought.html

Thank you for the opportunity to comment on this FEIS. Questions on these comments should be directed to myself at 913-551-7148, or cothern.joe@epa.gov.

Sincerely,

Joseph E. Cothern
NEPA Team Leader

cc: Doug Kluck, NOAA (via e-mail)